

January 23, 2013

**VIA ELECTRONIC FILING**

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 11-42 In the Matter of Lifeline Reform and Modernization  
NOTICE OF EX PARTE PRESENTATION**

Dear Ms. Dortch:

On January 23, 2013, Javier Rosado, Senior Vice President - Lifeline Services, TracFone Wireless, Inc. and undersigned counsel met with Commissioner Ajit Pai and with Courtney Reinhard, Legal Advisor -Wireless, to Commissioner Pai. During this meeting, we discussed TracFone's SafeLink Wireless<sup>®</sup> Lifeline program and described how the rules promulgated by the Commission in its February 6, 2012 report and order in this proceeding have impacted that program and how TracFone has changed its practices and procedures in response to the rule changes.

We also discussed several proposals for the Commission to consider as ways to further prevent waste, fraud, and abuse of Universal Service Fund resources in the Lifeline program. Those proposals include a requirement that Eligible Telecommunications Carriers retain copies of documentation of program-based eligibility for Lifeline enrollment provided to them by applicants. That proposal was first raised by TracFone in a Supplemental Petition for Reconsideration and Emergency Petition to Require Retention of Program-Based Eligibility documentation filed on May 30, 2012. Another proposal discussed is to prohibit the in-person distribution of handsets. We explained that the practice of in-person handset distribution not only creates the opportunity for fraudulent enrollment but has been the source of public criticisms of the Lifeline program in various media reports. Finally, we discussed mandatory minimum charges for Lifeline service -- an idea rejected by the Commission in its February 2102 report and order, and explained why mandatory minimum charges would not prevent waste, fraud and abuse, but would preclude many qualified low-income households from enrolling in Lifeline.

We provided Commissioner Pai and Ms. Reinhard with a written presentation summarizing those points as well as copies of TracFone's May 30, 2012 supplemental petition and its reply comments in the same matter. Copies of those materials are enclosed with this letter.

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Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed electronically. If there are questions regarding this letter or the materials provided herewith, please communicate directly with the undersigned.

Sincerely,



Mitchell F. Brecher  
*Counsel for TracFone Wireless, Inc.*

cc: Hon. Ajit Pai  
Ms. Courtney Reinhard

enclosures